

# Exhibit B

SEARCH WARRANT

STATE OF MICHIGAN)

) SS

COUNTY OF OAKLAND)

TO THE SHERIFF OR ANY OFFICER OF SAID COUNTY:

THE ATTACHED AFFIDAVIT having been sworn to by the Affiant, Detective Erik Hamilton, before me this day, based upon the facts stated therein, probable cause having been found; in the name of the People of the State of Michigan I command that you enter the following described place:

A cellular phone to wit: LG MS345 Leon with IMEI number 359563065925566.  
A Toshiba model C55-B5299 laptop with S/N 8E239577P, a Dell laptop P/N KX335 A01 and all other electronic devices, computer internal and peripheral storage devices, mass storage devices which were seized under the execution of a search warrant on March 2<sup>nd</sup>, 2016 at 16255 Tuller St in Detroit, MI. Said electronic devices are currently in the custody of the West Bloomfield Police Department located at 4530 Walnut Lake Rd, in the Township of West Bloomfield, State of Michigan, 48325.

Therein to search for, seize, secure, tabulate and make return according to law the following property and things:

Any and all evidence of **Child Sexually Abuse Material**; including but not limited to, all cell phones, all computer internal and peripheral storage devices, (such as fixed disks, external hard disks, floppy disk drives, and diskettes, tape drives, tapes, and optical storage devices), peripheral input / output devices (such as keyboards, printers, hardware, including, but not limited to, any equipment which can collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical or similar computer impulses or data. Any computer processing units, scanners, plotters, video display monitors, and optical readers), and related communication devices such as modems, cables, and connections, recording equipment, as well as any devices, mechanisms, or parts that can be used to restrict access to computer hardware. Furthermore, all passwords/passcodes must be surrendered for all electronic devices.

It is further ordered that these items will be seized and then later searched for evidence relating to Identity Theft and Credit Card Fraud.

**SOFTWARE:** Software is digital information which can be interpreted by a computer and any of its related components to direct the way they work. Software is stored in electronic, magnetic, optical, or other digital form. It commonly includes programs to run operating systems, applications (like word processing, graphics, or spread sheet programs), utilities, compilers, and communications programs. These items will be seized in order to facilitate the search of the computer systems / computer system components / computer systems storage media named above. The reasons these items are listed to be seized are outlined in the affidavit of this search warrant and incorporated hereto by reference.

**DOCUMENTATION:** Computer related documentation consists of written, recorded, printed, or electronically stored material which explains or illustrates how to configure or use computer hardware, software, or other related items. These items will be seized in order to facilitate the search of the computer systems / computer system components / computer systems storage media named above. The

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By Renee Va  
Deputy Clerk

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reasons these items are listed to be seized are outlined in the affidavit of this search warrant and incorporated hereto by reference.

**PASSWORDS AND DATA SECURITY DEVICES:** Computer passwords and other data security devices are designed to restrict access to or hide computer software, documentation or data. Data security devices may consist of hardware, software, or other programming code. A password (string of alpha-numeric characters) usually operates as a sort of digital key to unlock particular data security device(s). These items will be seized in order to facilitate the search of the computer systems / computer system components / computer systems storage media named above. The reasons these items are listed to be seized are outlined in the affidavit of this search warrant and incorporated hereto by reference.

**DOCUMENTS:** Documents of any nature, printed, or hand written which may relate to passwords, accomplices or co-conspirators. Any documents that shows ownership of or who resides at the premises to be searched.

**COMPUTERS:** Your Affiant knows from training and experience that computer systems commonly consist of central processing units (CPU's), hard disk drives, floppy disk drives, tape drives, and other forms of magnetic media containing computer information, display screens, keyboards, printers, modems, electronic cables, cassette tapes. In addition, the specific transmission of computerized imagery indicates the possible use of CD-Rom drives, image scanning devices, still cameras, video cameras, and VCRs.

All of the seized items will then be analyzed by a trained Examiner for the purpose of identifying and extracting data in accordance to accepted forensic practices. Some of this data may include e-mails, chat messages, internet history, search engine search terms, map history, pictures, videos, personal information about any suspect(s) and / or victim(s) and any other information relevant to the investigation into Identity Theft and Credit Card.

Other evidence of Child Sexually Abusive Material to include, but not limited to furniture, trash, cards, money, cell phones, SIM cards, handwritten notes, indicia of residency and/or occupancy of the premises described, including but not limited to correspondence, bills, envelopes and keys.

It is further ordered that a full and thorough examination may be conducted on the cellular phone device(s) and SIM card(s) by a trained examiner. This process may include a password/passcode bypass.

Note, a cellular phone is described as an electronic device used to make cellular telephone calls across a wide geographic area.

A cellular phone can make and receive telephone calls to and from the public telephone network which includes other mobiles and fixed-line phones across the world. It does this by connecting to a cellular network owned by a mobile network operator.

In addition to functioning as a telephone, a modern cellular phone typically supports additional services such as SMS messaging, MMS, e-mail and Internet access; short-range wireless (infrared or Bluetooth) communications; as well as business and gaming applications; and photography. Cellular phones that offer advanced computing abilities are referred to as smartphones.

During this examination the following data will be attempted to be extracted:

Call logs, to include incoming, outgoing and missed calls

Phonebook and contacts to include phone numbers, and e-mail addresses.

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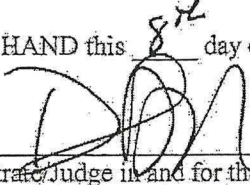
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SMS / MMS messages and attached multimedia files, to include incoming and outgoing.  
Secondary SMS applications and messages to include KIK, TextPlus and others  
E-mails to include incoming and outgoing  
Pictures and all ExIF information to include geotagging information (GPS location of the location of the picture.)  
Videos and geotagging information  
Audio files to include any voicemail stored on the device and voice notes  
Secondary phone number accounts such as Skype, Line 2 and other applications that can assign a second roaming phone number.  
WiFi network information, to include SSID (Network name) and GPS information of the network  
GPS directions  
Calendar information, including sync'd calendars  
Internet History and usage to including websites visited, search terms and Cookies  
And any account information, settings, and saved usage information for any and all installed applications, also known as "apps" on the device.

ISSUED UNDER MY HAND this 8<sup>th</sup> day of March, 2016.

  
\_\_\_\_\_  
Magistrate/Judge in and for the 48<sup>th</sup> District Court,  
Oakland County, State of Michigan.

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48th District Court

By Renee Va  
Deputy Clerk

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AFFIDAVIT SEARCH WARRANT

STATE OF MICHIGAN       )  
                                  ) SS  
COUNTY OF OAKLAND     )

Detective Erik Hamilton, Affiant, being first duly sworn, on oath deposes and says:

(1) That the following property constitutes evidence of criminal conduct:

Any and all evidence of **Child Sexually Abuse Material**; including but not limited to, all cell phones, all computer internal and peripheral storage devices, (such as fixed disks, external hard disks, floppy disk drives, and diskettes, tape drives, tapes, and optical storage devices), peripheral input / output devices (such as keyboards, printers, hardware, including, but not limited to, any equipment which can collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical or similar computer impulses or data. Any computer processing units, scanners, plotters, video display monitors, and optical readers), and related communication devices such as modems, cables, and connections, recording equipment, as well as any devices, mechanisms, or parts that can be used to restrict access to computer hardware. Furthermore, all passwords/passcodes must be surrendered for all electronic devices.

(2) Affiant further says that the above-mentioned property is located at the following described place:

A cellular phone to wit: LG MS345 Leon with IMEI number 359563065925566.  
A Toshiba model C55-B5299 laptop with S/N 8E239577P, a Dell laptop P/N KX335 A01 and all other electronic devices, computer internal and peripheral storage devices, mass storage devices which were seized under the execution of a search warrant on March 2<sup>nd</sup>, 2016 at 16255 Tuller St in Detroit, MI. Said electronic devices are currently in the custody of the West Bloomfield Police Department located at 4530 Walnut Lake Rd, in the Township of West Bloomfield, State of Michigan, 48325.

(3) Affiant further says that he has probable cause to believe the above-listed property to be searched for and seized is now located upon said described premises, based upon the following facts:

- A. Affiant currently works for the West Bloomfield Police Department and has been a police officer for approximately 9 years and has been assigned to the Investigations Bureau for the past two years.
- B. Affiant has attended multiple Computer, Cell Phone and Internet Crimes Investigation classes while assigned as a Detective.
- C. Affiant is a trained and certified cell phone examiner through PATCTECH.
- D. Affiant has been involved in over 200 cases dealing with online and cell phone investigations.

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- E. Affiant is presently investigating a Fraud complaint.
- F. Affiant reviewed West Bloomfield Police report, incident number 160002760, authored by Police Service Aide Mackenzie Crandall on February 16<sup>th</sup>, 2016 which indicates the following:
1. That Police Service Aide met with Fraud victim, [REDACTED] and her daughter [REDACTED], at the West Bloomfield Police Department Headquarters which is located in the Township of West Bloomfield, County of Oakland, State of Michigan, who advised the following:
    - i. That [REDACTED]'s Sam's Club MasterCard account has been compromised where fraudulent purchases totaling approximately \$57,000.00 have been made to various merchants without authorization.
      1. The address on this account had been changed to 16255 Tuller St in Detroit, MI and the name on the account changed to Jerry Harlem.
    - ii. That the address on [REDACTED]'s TJ Maxx account had been changed to 16255 Tuller St in Detroit, MI, but no known charges have been made to this account.
    - iii. That [REDACTED]'s Home Depot credit card account had been compromised where unauthorized purchases were made to this account. Upon learning of the fraud, [REDACTED] contacted Home Depot at which time the account was closed and a new one opened.
      1. [REDACTED] received two new credit cards from Home Depot with one containing her name and the second displaying the name of Mark Pumpkin.
    - iv. That on December 20th, 2015, [REDACTED] received a letter in the mail from QVC congratulating her on her newly opened account, which [REDACTED] stated, is fraudulent.
    - v. That [REDACTED] alleges a fraudulent Best Buy account (#4269380017238860) has been opened with purchases totaling \$3,391.98 charged to this account on February 1st, 2016.
    - vi. That an unknown person(s) has altered the address of [REDACTED]'s Barclay account to 16255 Tuller St in Detroit, MI.
    - vii. That accounts with Meijer and Zales have been created in [REDACTED]'s name although the account numbers and charges are unknown at this time.
    - viii. That on January 29th, 2016, Nissu received a phone call from 313.974.1665 where upon receipt, her caller ID displayed the name [REDACTED].
      1. [REDACTED] contacted her home phone service provider of Comcast, at which time Comcast advised that her phone call history showed call forwarding to the phone number of 313.576.7335, which she has no knowledge of.
    - ix. That on February 17th, 2016, a black female came to D-Town Liquor store in Detroit, which is owned by the [REDACTED]'s, where the black female informed Mr. [REDACTED] that her boyfriend, Marlon Johnson, and his friend had been making numerous phone calls to businesses regarding credit cards and making purchases using [REDACTED]'s full name. The black female who came in to the store indicated the phone number (313.576.7335) that the calls are being forwarded to belongs to her boyfriend's friend. This female did not identify herself.

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G. Affiant reviewed [REDACTED]'s Sam's Club Synchrony Bank MasterCard statement where I found the following fraudulent purchases conducted at local businesses:

1. 12/31/2015- Zeidman's Jewelry in the amount of \$3,600.00.
2. 01/01/2016-Home Depot store #2731 in the amount of \$952.94.
3. 01/02/2016-Footaction store #57680 in the amount of \$524.68.
4. Two purchases on 01/03/2016-Footaction store #57680 totaling \$805.60.
5. 01/04/2016-GTL Inmate Phone Service in the amount of \$25.00
6. 01/04/2016-Royalty Seats in the amount of \$815.36.
7. 01/04/2016-Summit Racing mail order in the amount of \$3,495.90.
8. 01/05/2016-Axle of Dearborn in the amount of \$190.80.
9. 01/05/2016-Mechanical Heating and Cooling in the amount of \$2,448.00.
10. 01/05/2016-Royalty Seats in the amount of \$1,095.00.
11. 01/05/2016-Home Depot store #2731 in the amount of \$2,282.14.
12. 01/06/2016-Best Buy in the amount of \$4,714.84
13. 01/06/2016-GTL Inmate Phone Service in the amount of \$100.00
14. 01/06/2016-Swiss Watch Expo in the amount of \$7,050.00.
15. 01/18/2016-Best Buy in the amount of \$6,510.41.
16. 01/19/2016-Best Buy in the amount of \$3,073.98.

H. Affiant spoke with Home Depot Fraud Investigator Rich Schultz where upon searching [REDACTED]'s MasterCard number in their database he found an order for appliances was placed over the phone where the order lists a customer name of [REDACTED] (victim) and a contact name of "Jerry Harlen" with a phone number of 313.974.1665. The order also lists a customer address of "166225 Teller St." in Detroit, MI.

1. The Home Depot order was picked up at Home Depot store #2731 in Madison Heights, MI by a black male wearing a green hooded sweatshirt with a black jacket with a white logo on the left chest over top, black hair and possibly being unshaven or having facial hair.

I. Affiant spoke with the Summit Racing order verification department where they confirmed an order in the amount of \$3,495.90 had been placed over the internet for 2 GM engine control modules where the order was supposed to be shipped to 1625 Tuller St in Detroit, MI, but the shipment had been stopped before it was sent out and the money was refunded back to [REDACTED]'s MasterCard.

1. During the placement of the order, Summit Racing captured an IP Address of 208.54.40.209 and a device number of 615460264158312308.
2. Summit Racing also located a second profile in the name of Thomas Stumps which used the same device number and IP Address.

J. Affiant spoke with Mechanical Heating and Cooling where they advised a work order was created in the name of Brian Thomas with an address of 16255 Tuller St in Detroit, MI.

1. Thomas requested that a new furnace be installed at his rental property located at 13413 Wilshire St in Detroit, MI.
2. Nissu's MasterCard was given to Mechanical Heating and Cooling over the phone along with the 3 digit security code and expiration date for payment.
3. During the installation of the new furnace, there were several women present inside the home where one of them signed the work order upon completion.

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K. Affiant spoke with Royalty Seats sales manager, Ben Myers who confirmed that an order in the amount of \$815.36 in the name of [REDACTED] had been placed for tickets to an upcoming Martin Lawrence show at the Fox Theatre. During this transaction the IP Address of 208.54.40.182 was captured.

1. The initial purchase of \$815.36 was completed online where Myers contacted [REDACTED] on the phone number of 313.974.1665 where he spoke with a female who identified herself as [REDACTED]
2. Myers advised that while confirming the order, the female requested to purchase 6 more tickets to the same show which totaled \$1,095.00.
3. Myers requested that [REDACTED] provide a copy of her license and credit card upon completing the transaction. Myers received a copy of the credit card but no identification.

L. On February 29<sup>th</sup>, 2016, Affiant obtained a signed search warrant for the residence located at 16255 Tuller St in Detroit, MI 48221.

1. This signed search warrant also allotted the collection of all electronic devices located inside the home.

M. On March 2<sup>nd</sup>, 2016, the search warrant was executed upon 16255 Tuller St located in Detroit, MI, 48221 where during the execution of the warrant, Detectives seized a black LG M6530N cell phone and black Toshiba Laptop belonging to Ryon Travis, DOB 01/21/1984, who was present at the home. These devices were transported to the West Bloomfield Police Department for examination.

N. During an examination of the LG MS345 Leon cell phone, Affiant located child sexually abusive images that were stored on this device.

O. Detective Lillard conducted an examination of the Toshiba Laptop where he too located items of child sexually abusive material on the computer's hard drive.

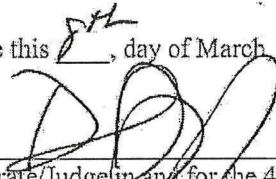
P. That based on the above stated facts, the Affiant has probable cause to believe that the above stated items will be located in the above stated place to be searched.

Q. That the execution of this search warrant is essential to the Affiant's investigation of the crime of Child Sexually Abusive Material.



Detective Erik Hamilton, Affiant

Subscribed and sworn to before me this 8<sup>th</sup> day of March, 2016.

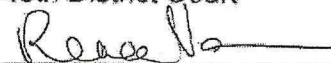


Magistrate/Judge in and for the 48<sup>th</sup> District Court,  
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